

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	No. 08 CR 0122
v.)	Magistrate Judge Maria Valdez
)	
KEVIN WADDELL)	

MOTION FOR PRETRIAL RELEASE

KEVIN WADDELL, defendant herein, by and through his attorney, Gary Ravitz, respectfully moves for an order of pretrial release, and in support states the following:

1. Mr. Waddell is one of a host of defendants charged in the captioned complaint. He currently is detained in Kankakee County.
2. The report of Pretrial Services states that Mr. Waddell can be released with conditions on a secure bond.
3. Mr. Waddell agrees to abide the conditions proposed by Pretrial Services in its report.
4. Mr. Waddell will reside with Sparkle Seals in her home, which is located at 1431 Walnut Hill Avenue in St Charles, Illinois. Ms. Seals will agree to act as a third party custodian, and agrees to report any infractions without delay. In addition, her home is equipped with a telephone that can accommodate a condition of electronic monitoring.
5. Mr. Billy Orsborn will post his interest in the real estate located at 103 Waldren Road, Joliet, Illinois, as security. Mr. Orsborn, who will appear at the hearing, also will provide adequate documentation of his ownership interest in the real estate.

WHEREFORE, KEVIN WADDELL respectfully moves for entry of a pretrial order release.

Respectfully submitted,

s/ Gary Ravitz

Gary Ravitz, attorney for
Kevin Waddell

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